

## DELEGATED DECISION OFFICER REPORT

AUTHORISATION	INITIALS	DATE
File completed and officer recommendation:	AL	14/01/2019
Planning Development Manager authorisation:	AN	14/1/19
Admin checks / despatch completed	SB	14/01/19.

**Application:** 18/01699/FUL **Town / Parish:** Wrabness Parish Council

**Applicant:** Mr & Mrs S Puse

**Address:** The Priory Harwich Road Wrabness

**Development:** Erection of 4no four bedroom detached dwellings with garages. Amendments to existing access road with provision of turning head.

### **1. Town / Parish Council**

Wrabness Parish Council **Objection -** The proposal is contrary to the published Tendring District Local Plan. The proposed housing development is located well beyond the settlement limits for Wrabness, remote from village services and is not a sustainable location for residential development. The proposed housing and related highway proposals would intrude into the open countryside and create a precedent for sporadic housing development elsewhere along the Harwich Road.

### **2. Consultation Responses**

**Tree & Landscape Officer** The application site is set to grass with a row of trees on the northern boundary adjacent to the highway. It appears from the layout provided that the development of the land is possible without causing harm to the trees and that their retention would provide valuable screening.

It may not be necessary for the applicant to provide a detailed Arboricultural Impact Assessment (AIA) as long as they show that the development will not encroach into the Root Protection Areas (RPAs) of retained trees. The applicant has stated in section 3:30 of their Planning Statement that these trees will be retained and it appears to be the case that their removal is not required implement the development proposal. Nevertheless the applicant has not provided evidence to show that this is the case.

If planning permission is likely to be granted then details of the physical protection of the trees during the construction period of the development should be secured by condition. The information should be in accordance with BS5837 2012 Trees in relation to designs, demolition and construction: Recommendations.

In terms of the impact of the development of the land on the character and appearance of the countryside, and notwithstanding the screening benefit of the existing trees, it is considered that the intensification of ribbon development would be undesirable and would detract from the rural character of the local environs.

Details of the indication soft landscaping shown on the site layout plan should be secured by condition.

**ECC Highways Dept**

From a highway and transportation perspective the impact of the proposal is acceptable to Highway Authority subject to the following

mitigation and conditions:

1 Prior to the first occupation of the development, the proposed Private Drive at its bellmouth junction with Harwich Road shall be provided with 6.0m. radius kerbs returned to an access road carriageway width of 6.0m with a flanking footway 2m. in width returned around the eastern radius kerbs to the external tangent. The new road junction shall be constructed at least to binder course prior to the commencement of any other development including the delivery of materials.

Reason: To ensure that all vehicular traffic using the junction may do so in a controlled manner and to provide adequate segregated pedestrian access, in the interests of highway safety and in accordance with Policy DM 1 and 6 of the Highway Authority's Development Management Policies February 2011.

2 Prior to the occupation of any of the proposed development the internal road and footway layout shall be provided in accord with Drawing Numbered 114/S0/01/B.

Reason: To ensure that vehicles using the site access do so in a controlled manner, in the interests of highway safety and in accordance with Policy DM 1 of the Highway Authority's Development Management Policies February 2011.

3 Prior to the proposed Private Drive access being brought into use, vehicular visibility splays of site maximum eastwards by 2.4m as measured along, from and along the nearside edge of the carriageway, shall be provided from the centre line of the access and shall be retained and maintained free from obstruction clear to ground thereafter.

Reason: To ensure adequate intervisibility between drivers of vehicles using the proposed access and those in the adjoining highway, in the interests of highway safety and in accordance with Policy DM 1 of the Highway Authority's Development Management Policies February 2011.

4 The development shall not be occupied until such time as the car parking area, indicated on the approved plans, has been hard surfaced and sealed. The car parking area shall be retained in this form at all times and shall not be used for any purpose other than the parking of vehicles related to the use of the development thereafter.

Reason: To ensure that on-street parking of vehicles in the adjoining streets does not occur, in the interests of highway safety and in accordance with Policy DM 1 and 8 of the Highway Authority's Development Management Policies February 2011.

5 Prior to the occupation of the proposed development, details of the provision for the storage of bicycles sufficient for all occupants of that development, of a design this shall be approved in writing with the Local Planning Authority. The approved facility shall be secure, convenient, covered and provided prior to the first occupation of the proposed development hereby permitted within the site which shall be maintained free from obstruction and retained thereafter.

Reason: To promote the use of sustainable means of transport in accordance with Policy DM 1 and 9 of the Highway Authority's Development Management Policies February 2011.

6 No unbound materials shall be used in the surface treatment of the proposed Private Drive within 10m of the highway boundary.

Reason: To ensure that loose materials are not brought out onto the

highway, in the interests of highway safety and in accordance with Policy DM 1 of the Highway Authority's Development Management Policies February 2011.

7 Prior to first occupation of the proposed development, a communal recycling/bin/refuse collection point shall be provided within 15m of the highway boundary or adjacent to the highway boundary and additionally clear of all visibility splays at accesses and retained thereafter.

Reason: To minimise the length of time a refuse vehicle is required to wait within and cause obstruction of the highway, in the interests of highway safety and in accordance with Policy DM 1 of the Highway Authority's Development Management Policies February 2011.

8 Prior to the first occupation of each dwelling on the proposed development, the individual proposed vehicular access for that dwelling shall be constructed at right angles to the highway boundary and to a width of 3.7m and each shared vehicular access shall be constructed at right angles to the highway boundary and to a width of 5.5m and shall be provided with an appropriate dropped kerb vehicular crossing of the footway/highway verge to the specifications of the Highway Authority.

Reason: To ensure that vehicles using the site access do so in a controlled manner, in the interests of highway safety and in accordance with Policy DM 1 of the Highway Authority's Development Management Policies February 2011.

Continued

Informative1: All work within or affecting the highway is to be laid out and constructed by prior arrangement with and to the requirements and specifications of the Highway Authority; all details shall be agreed before the commencement of works.

The applicants should be advised to contact the Development Management Team by email at [development.management@essexhighways.org](mailto:development.management@essexhighways.org) or by post to:

SMO1 - Essex Highways  
Colchester Highways Depot,  
653 The Crescent,  
Colchester  
CO4 9YQ

UU Open Spaces

Response from Public Experience  
Open Space & Play

Application Details

Application No: 18/01699/FUL

Site Address: Erection of 4no four bedroom detached dwelling with garages. Amendments to existing access road with provision of turning head

Description of Development: The Priory Harwich Road Wrabness

Current Position

There is currently a deficit of 0.30 hectares of play and formal open space in Wrabness.

There is one play space in Wrabness, located at Rectory Road. The play space is classified as a Local Equipped Area for Play.

Any further development in Wrabness will increase demand on already stretched facilities. To account for any further development in Wrabness the parish council have plans to increase the size of the play area.

#### Recommendation

Due to the lack of play/formal open space in Wrabness it is felt a contribution towards play and formal open space is justified and relevant to the planning application. To be spent on new equipment at the play area/open space at:

Rectory Road, Wrabness

### **3. Planning History**

03/01794/AGRIC	Steel portal frame for potato/grain store	Determination	30.09.2003
08/01687/AGRIC	Erection of 4 bay hay barn.		22.12.2008
09/00005/AGRIC	4 bay hay barn for the storage of crops.	Determination	02.02.2009
10/01216/FUL	Single storey rear extension for private use.	Approved	10.12.2010
17/01838/FUL	Proposed single storey rear extension - to form living room & bedroom.	Approved	18.12.2017
18/30151/PREAPP	Proposed erection of four 4no. bedroom homes each with a garage and parking space for 2no. cars. New roadway and pedestrian access, including turning space.	Refused	07.09.2018

### **4. Relevant Policies / Government Guidance**

NPPF National Planning Policy Framework July 2018

National Planning Practice Guidance

Tendring District Local Plan 2007

QL1 Spatial Strategy

QL9 Design of New Development

QL10 Designing New Development to Meet Functional Needs

QL11 Environmental Impacts and Compatibility of Uses

HG1 Housing Provision

HG6 Dwelling Size and Type

HG7 Residential Densities

HG9 Private Amenity Space

EN1 Landscape Character

COM6 Provision of Recreational Open Space for New Residential Development

TR1A Development Affecting Highways

TR7 Vehicle Parking at New Development

Tendring District Local Plan 2013-2033 and Beyond Publication Draft (June 2017)

SP1 Presumption in Favour of Sustainable Development

SPL1 Managing Growth

SPL3 Sustainable Design

LP1 Housing Supply

LP2 Housing Choice

LP3 Housing Density and Standards

LP4 Housing Layout

PPL3 The Rural Landscape

HP5 Open Space, Sports & Recreation Facilities

CP1 Sustainable Transport and Accessibility

CP2 Improving the Transport Network

Local Planning Guidance

Essex County Council Car Parking Standards - Design and Good Practice

Essex Design Guide

### **Status of the Local Plan**

The 'development plan' for Tendring is the 2007 'adopted' Local Plan. Paragraph 213 of the NPPF (2018) allows local planning authorities to give due weight to adopted albeit outdated policies according to their degree of consistency with the policies in the NPPF. Paragraph 48 of the NPPF also allows weight to be given to policies in emerging plans according to their stage of preparation, the extent to which there are unresolved objections to relevant policies and the degree of consistency with national policy. As of 16th June 2017, the emerging Local Plan for Tendring is the Tendring District Local Plan 2013-2033 and Beyond Publication Draft.

Section 1 of the Local Plan (which sets out the strategy for growth across North Essex including Tendring, Colchester and Braintree) was examined in January and May 2018 and the Inspector's initial findings were published in June 2018. They raise concerns, very specifically, about the three 'Garden Communities' proposed in north Essex along the A120 designed to deliver longer-term



sustainable growth in the latter half of the plan period and beyond 2033. Further work is required to address the Inspector's concerns and the North Essex Authorities are considering how best to proceed.

With more work required to demonstrate the soundness of the Local Plan, its policies cannot yet carry the full weight of adopted policy, however they can carry some weight in the determination of planning applications. The examination of Section 2 of the Local Plan will progress once matters in relation to Section 1 have been resolved. Where emerging policies are particularly relevant to a planning application and can be given some weight in line with the principles set out in paragraph 48 of the NPPF, they will be considered and, where appropriate, referred to in decision notices. In general terms however, more weight will be given to policies in the NPPF and the adopted Local Plan.

In relation to housing supply:

The NPPF requires Councils to boost significantly the supply of housing to meet objectively assessed future housing needs in full. In any one year, Councils must be able to identify five years' worth of deliverable housing land against their projected housing requirements (plus an appropriate buffer to ensure choice and competition in the market for land, account for any fluctuations in the market or to improve the prospect of achieving the planned supply). If this is not possible, or housing delivery over the previous three years has been substantially below (less than 75%) the housing requirement, paragraph 11 d) of the NPPF requires applications for housing development needing to be assessed on their merits, whether sites are allocated for development in the Local Plan or not. At the time of this decision, the Council is able to demonstrate a robust five year supply of deliverable housing sites (as confirmed in recent appeal decisions) and housing delivered over the previous three years has been comfortably above 75% of the requirement. There is consequently no need for the Council to consider an exceptional departure from the Local Plan on housing supply grounds and applications for housing development are to be determined in line with the plan-led approach.

## **5. Officer Appraisal (including Site Description and Proposal)**

### Site Description

The application relates to the property known as The Priory located to the south-west of Wrabness on the southern side of Harwich Road. The Priory fronts Harwich Road with an existing vehicular access at the side of the main dwelling. There is a further access to the west of the property. The occupants of the donor property park to the rear alongside an existing former agricultural building which is used for storage. The donor dwelling has its clearly defined curtilage to the front, sides and rear and alongside on the western side is a rectangular portion of land set back from the road and fenced. This comprises the application site.

The application site extends approximately 0.31 hectares in size and is defined by a mature tree boundary to the frontage close to the road. The site will be served by the existing vehicular access on the western side.

The site lies outside of the Settlement Development Boundary as defined by the adopted Tendring District Local Plan (2007) and the emerging Tendring District Local Plan 2013-2033 and Beyond Publication Draft (2017). The proposed extension to the Suffolk Coastal and Heaths Area of Outstanding Natural Beauty lies opposite.

### Description of Proposal

The application seeks full planning permission for the erection of 4 no. four bedroom detached dwellings with garages together with amendments to the existing access road and provision of a turning head.

### Assessment

The main considerations in this instance are;

- Principle of Development;
- Layout, Scale and Landscape Impact;

- Trees and Landscaping;
- Highway Safety and Parking;
- Residential Amenities;
- Financial Contributions; and,
- Representations.

#### Principle of Development

The site lies outside of the Settlement Development Boundary as defined by the adopted Tendring District Local Plan (2007) and the emerging Tendring District Local Plan 2013-2033 and Beyond Publication Draft (2017). Saved Tendring District Local Plan (2007) Policy QL1 sets out that development should be focussed towards the larger urban areas and to within development boundaries as defined within the Local Plan. These sentiments are carried forward in emerging Policy SPL1 of the Publication Draft.

The Council can demonstrate, with robust evidence, a five-year supply of deliverable housing sites and this has been confirmed in recent appeal decisions. This is based on a housing requirement of 550 dwellings per annum which has been confirmed as sound by the Inspector for the Local Plan examination on 27 June 2018 (Examination of the Strategic Section 1 Plan - Meeting the Need for New Homes (Plan chapter 4)). Therefore policies for the supply of housing are not out of date and applications for housing development are to be determined in accordance with the Local Plan.

Therefore, having regard to the latest housing land supply figures and with the emerging Local Plan progressing well, officers consider that greater weight can be given to Section 3 (Plan-Making) of the National Planning Policy Framework (NPPF). Under this section, paragraphs 15, 17 and 20 state that the planning system should be genuinely plan-led, must include strategic policies to address local planning authority's priorities for the development and use of land, and should set out an overall strategy for the pattern, scale and quality of housing development.

Emerging Policy SPL1 of the Publication Draft of the Local Plan 2017 includes a 'settlement hierarchy' aimed at categorising the district's towns and villages and providing a framework for directing development toward the most sustainable locations therefore being in line with the aims of the aforementioned paragraphs 15, 17 and 20 of the NPPF. This is the emerging policy equivalent to Saved Policy QL1 of the adopted Tendring District Local Plan 2007 which states that development should be focussed towards the larger urban areas and to within development boundaries as defined within the Local Plan as referred to above.

Wrabness is identified as a village within saved Policy QL1 of the adopted Tendring District Local Plan 2007 and is defined as a Smaller Rural Settlement within Policy SPL1 of the emerging Tendring District Local Plan Publication Draft (2017). These smaller villages are considered to be the least sustainable locations for growth.

In applying the NPPF's presumption in favour of sustainable development, the adverse impacts of the proposal, both on the undeveloped character of the locality and on the Council's ability to manage growth through the plan-led approach, are not outweighed by the benefits. The development is unnecessary and there are no public benefits that might warrant the proposal being considered in an exceptional light. The proposal is therefore contrary to the aims of the NPPF and contrary to the development plan.

#### - Assessment of Sustainable Development

Officers consider that Saved Policy QL1 and emerging Policy SPL1 are in line with the aforementioned aims of the NPPF. However, until such time as the emerging local plan has been adopted, and for the purposes of completeness in assessing sustainable development, the 3 dimensions as set out within the NPPF can be addressed as follows;

#### - Economic

Officers consider that the proposal would contribute economically to the area, for example by providing employment during the construction of the development and from future occupants utilising local services, and so meets the economic arm of sustainable development.

#### - Social

As stated above, Wrabness is categorised in emerging Policy SPL1 as a 'Smaller Rural Settlement' in recognition of its size and small range of local services. Wrabness is therefore considered to be one of the least sustainable settlements for growth.

These smaller villages are considered to be the least sustainable locations for growth and there is a concern that encouraging too much development in these areas will only serve to increase the number of people having to rely on cars to go about their everyday lives. It is accepted that each of these smaller rural settlements can achieve a small scale increase in housing stock over the plan period. To allow for this to happen, Settlement Development Boundaries have been drawn flexibly, where practical, to accommodate a range of sites both within and on the edge of villages and thus enabling them to be considered for small-scale residential 'infill' developments. With this in mind, where appropriate the emerging Local Plan settlement development boundary has been extended but does not include the application site or extend close to its locality.

In this instance, the application site is located approximately 1.5 km from the edge of the settlement boundary of Wrabness with its already limited range of services and amenities. In this regard, there is no access to day to day needs within a practical walking distance and the conditions are unsafe these country roads with little to no footpaths or street lighting. Any social sustainability credentials of the site are severely diminished due to its distance from the built up area of Wrabness which already has limited local services. Whilst it is recognised that there is a bus stop in close proximity of the site with services to Manningtree, it is highly likely that the occupants of the proposed dwellings would be car dependant failing to promote sustainable modes of transport therefore failing to meet the social strand of sustainable development. Granting permission for 4 additional dwellings in this unsustainable location when the supply of housing to meet the projected needs over the emerging plan period has already been achieved is unnecessary.

Regardless of the Council's housing land supply position, the application fails to meet the social strand of sustainable development as set out within the NPPF and is contrary to the aforementioned local plan policies and the aims of the NPPF as a whole.

#### - Environmental

The environmental role is about contributing to protecting and enhancing the natural and built environment which is considered below under the heading Layout, Scale, Character and Appearance.

##### Layout, Scale and Landscape Impact

Paragraph 127 of the National Planning Policy Framework 2018 (NPPF) requires that development should respond to local character and history, and reflect the identity of local surroundings. It goes on to say that local distinctiveness should be promoted and reinforced. Saved Policy QL9 and EN1 of the Tendring District Local Plan (2007) and Policy SPL3 and PPL3 of the emerging Tendring District Local Plan 2013-2033 and Beyond Publication Draft (June 2017) seeks to ensure that development is appropriate in its locality and does not harm the appearance of the landscape. Outside development boundaries, the Local Plan seeks to conserve and enhance the countryside for its own sake by not allowing new housing unless it is consistent with countryside policies.

Although the site could not be described as wholly isolated due to the presence of The Priory and other built form opposite and to the north-west, the overall character of the area is rural in nature being dominated by open fields and agricultural land and buildings. Examples of residential dwellings in the locality are sporadic, modest and rural in character.

The large scale of the dwellings together with the density and layout are wholly inappropriate and out of character with the area. The inward facing layout of the dwellings again is wholly out of character where the few examples of dwellings in the vicinity address the main road. Furthermore, the grandiose design approach to the dwellings is wholly inappropriate and 4 dwellings of the same design lacks interest and variation and is poor in design terms failing to reflect local surroundings or distinctiveness.



The development would create an incongruous and imposing development to the severe detriment of the rural character of the area. The development represents an unplanned advance of urbanisation into the countryside eroding the rural character resulting in a detrimental impact upon the rural landscape and views from and into the proposed extension of Suffolk Coastal and Heaths Area of Outstanding Natural Beauty which lies opposite. In applying the NPPF's presumption in favour of sustainable development, the adverse environmental impacts of the proposal on the character of the locality are not outweighed by any benefits. The landscape impact is further addressed below under 'Trees and Landscaping'.

#### Trees and Landscaping

The Council's Principle Tree and Landscaping Officer has been consulted on the application stating that it appears from the layout provided that the development of the land is possible without causing harm to the trees and that their retention would provide valuable screening subject to details of the physical protection of the trees during the construction.

However, in terms of the impact of the development of the land on the character and appearance of the countryside, and notwithstanding the screening benefit of the existing trees, it is considered that the intensification of ribbon development would be undesirable and would detract from the rural character of the local environs.

#### Highway Safety and Parking

Saved Policy QL10 of the adopted Tendring District Local Plan 2007 states that planning permission will only be granted, if amongst other things, access to the site is practicable and the highway network will be able to safely accommodate the additional traffic the proposal will generate. Officers consider that sufficient space is available on site to provide a development that could achieve parking in line with the requirements the Council's current adopted Parking Standards.

Essex County Council Highway Authority raise no objection to the development subject to conditions.

#### Residential Amenities

The NPPF, in paragraph 127 states that planning should always seek to secure a good standard of amenity for all existing and future occupants of land and buildings. In addition, Policy QL11 of the Tendring District Local Plan (2007) states that amongst other criteria, 'development will only be permitted if the development will not have a materially damaging impact on the privacy, daylight or other amenities of occupiers of nearby properties'. Policy SPL3 of the Tendring District Local Plan 2013-2033 and Beyond Publication Draft (June 2017) supports these objectives.

Officers consider that sufficient space is available on site to provide a development that could achieve an internal layout and separation distances that would not detract from the amenities of The Priory or the future occupiers of the proposed dwellings and would provide private amenity areas in excess of the standards set out within Saved Policy HG9 of the adopted Local Plan.

#### Financial Contributions

Paragraph 54 of the National Planning Policy Framework (2018) states Local Planning Authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Paragraph 56 of the NPPF states planning obligations must only be sought where they are necessary to make the development acceptable in planning terms, directly relate to the development and fairly and reasonably relate in scale and kind to the development.

Policy COM6 of the adopted Tendring District Local Plan 2007 states "For residential development below 1.5 hectares in size, developers shall contribute financially to meet the open space requirements of the development in proportion to the number and size of dwellings built".

There is currently a deficit of 0.30 hectares of play and formal open space in Wrabness and any further development in Wrabness will increase demand on already stretched facilities.

Due to the lack of play/formal open space in Wrabness it is felt a contribution towards play and formal open space is justified and relevant to the planning application. This application is not accompanied by a correctly completed unilateral undertaking for a contribution towards play and formal open space facilities and therefore this scheme does not comply with Policy COM6.

### Representations

Wrabness Parish Council object to the application on the following grounds;

- Contrary to the published Tendring District Local Plan.
- Site well beyond the settlement limits for Wrabness.
- Remote from village services.
- Not a sustainable location for residential development.
- The proposed housing and related highway proposals would intrude into the open countryside.
- Create a precedent for sporadic housing development elsewhere along the Harwich Road.

5 letters of objections have been received. The objections raised can be summarised as follows;

- Outside defined development boundary for Wrabness.
- Wrabness is a rural settlement.
- Completely incongruous development being out of keeping, out of scale and out of character with the rural character of the area.
- Harmful to countryside and landscape.
- 5 year housing supply met – no need.
- Unsustainable development.
- No amenities, or services or employment to support development.
- Poor transport links.
- Development would be reliant on car.
- Harm to trees and wildlife.
- Harm to views from Suffolk Coastal and Heaths Area of Outstanding Natural Beauty.
- Increased flood risk from surface water flooding from hardsurfacing.
- Environmental harm from private sewage and water treatment proposals.
- Conflict with agricultural traffic.
- Unsuitable and hazardous access and road layout.
- Large properties out pricing locals.
- Set a harmful precedent for further erosion of the countryside.
- Loss of Grade 1 agricultural land.

These considerations are addressed in the main report above.

The site is not shown on our records as Grade 1 agricultural land.

### Conclusion

Due the severe and overriding harm identified above, the application represents an unsustainable form of development contrary to national and local plan policies and is therefore recommended for refusal.

## **6. Recommendation**

Refusal - Full

## **7. Reasons for Refusal**

- 1 The site lies outside of the Settlement Development Boundary as defined by the adopted Tendring District Local Plan (2007) and the emerging Tendring District Local Plan 2013-2033 and Beyond Publication Draft (2017). Saved Tendring District Local Plan (2007) Policy QL1 sets out that development should be focussed towards the larger urban areas and to within development boundaries as defined within the Local Plan. These sentiments are carried forward in emerging Policy SPL1 of the Publication Draft.

The Council can demonstrate, with robust evidence, a five-year supply of deliverable housing sites and this has been confirmed in recent appeal decisions. This is based on a housing requirement of 550 dwellings per annum which has been confirmed as sound by the Inspector for the Local Plan examination on 27 June 2018 (Examination of the Strategic Section 1 Plan - Meeting the Need for New Homes (Plan chapter 4)). Therefore policies for the supply of housing are not out of date and applications for housing development are to be determined in accordance with the Local Plan.

Therefore, having regard to the latest housing land supply figures and with the emerging Local Plan progressing well, officers consider that greater weight can be given to Section 3 (Plan-Making) of the National Planning Policy Framework 2018 (NPPF). Under this section, paragraphs 15, 17 and 20 state that the planning system should be genuinely plan-led, must include strategic policies to address local planning authority's priorities for the development and use of land, and should set out an overall strategy for the pattern, scale and quality of housing development.

Emerging Policy SPL1 of the Publication Draft of the Local Plan 2017 includes a 'settlement hierarchy' aimed at categorising the district's towns and villages and providing a framework for directing development toward the most sustainable locations therefore being in line with the aims of the aforementioned paragraphs 15, 17 and 20 of the NPPF. This is the emerging policy equivalent to Saved Policy QL1 of the adopted Tendring District Local Plan 2007 which states that development should be focussed towards the larger urban areas and to within development boundaries as defined within the Local Plan as referred to above.

Wrabness is identified as a village within saved Policy QL1 of the adopted Tendring District Local Plan 2007 and is defined as a Smaller Rural Settlement within Policy SPL1 of the emerging Tendring District Local Plan Publication Draft (2017). These smaller villages are considered to be the least sustainable locations for growth.

In applying the NPPF's presumption in favour of sustainable development, the adverse impacts of the proposal, both on the undeveloped character of the locality and on the Council's ability to manage growth through the plan-led approach, are not outweighed by the benefits. The development is unnecessary and there are no public benefits that might warrant the proposal being considered in an exceptional light. The proposal is therefore contrary to the aims of the NPPF and contrary to the development plan.

- 2 Paragraph 8 of the National Planning Policy Framework 2018 (NPPF) sets out the overarching objectives for achieving sustainable development, one being the social objective which requires the planning system to support strong, vibrant and healthy communities with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.

Wrabness is identified as a village within saved Policy QL1 of the adopted Tendring District Local Plan 2007 and is defined as a Smaller Rural Settlement within Policy SPL1 of the emerging Tendring District Local Plan Publication Draft (2017).

These smaller villages are considered to be the least sustainable locations for growth and there is a concern that encouraging too much development in these areas will only serve to increase the number of people having to rely on cars to go about their everyday lives. It is accepted that each of these smaller rural settlements can achieve a small scale increase in housing stock over the plan period. To allow for this to happen, Settlement Development Boundaries have been drawn flexibly, where practical, to accommodate a range of sites both within and on the edge of villages and thus enabling them to be considered for small-scale residential 'infill' developments. With this in mind, where appropriate the emerging Local Plan settlement development boundary has been extended but does not include the application site or extend close to its locality.

In this instance, the application site is located approximately 1.5 km from the edge of the settlement boundary of Wrabness with its already limited range of services and amenities.

In this regard, there is no access to day to day needs within a practical walking distance and the conditions are unsafe these country roads with little to no footpaths or street lighting. Any social sustainability credentials of the site are severely diminished due to its distance from the built up area of Wrabness which already has limited local services. Whilst it is recognised that there is a bus stop in close proximity of the site with services to Manningtree, it is highly likely that the occupants of the proposed dwellings would be car dependant failing to promote sustainable modes of transport therefore failing to meet the social strand of sustainable development. Granting permission for 4 additional dwellings in this unsustainable location when the supply of housing to meet the projected needs over the emerging plan period has already been achieved is unnecessary.

Regardless of the Council's housing land supply position, the application fails to meet the social strand of sustainable development as set out within the NPPF and is contrary to the afore-mentioned local plan policies and the aims of the NPPF as a whole.

- 3 Paragraph 8 of the National Planning Policy Framework 2018 (NPPF) sets out the overarching objectives for achieving sustainable development, one being the environmental objective which requires the planning system to contribute to protecting and enhancing our natural, built and historic environment. Furthermore, Paragraph 127 of the NPPF requires that development should respond to local character and history, and reflect the identity of local surroundings. It goes on to say that local distinctiveness should be promoted and reinforced. Saved Policy QL9 and EN1 of the Tendring District Local Plan (2007) and Policy SPL3 and PPL3 of the emerging Tendring District Local Plan 2013-2033 and Beyond Publication Draft (June 2017) seeks to ensure that development is appropriate in its locality and does not harm the appearance of the landscape. Outside development boundaries, the Local Plan seeks to conserve and enhance the countryside for its own sake by not allowing new housing unless it is consistent with countryside policies.

Although the site could not be described as wholly isolated due to the presence of The Priory and other built form opposite and to the north-west, the overall character of the area is rural in nature being dominated by open fields and agricultural land and buildings. Examples of residential dwellings in the locality are sporadic, modest and rural in character.

The large scale of the dwellings together with the density and layout are wholly inappropriate and out of character with the area. The inward facing layout of the dwellings again is wholly out of character where the few examples of dwellings in the vicinity address the main road. Furthermore, the grandiose design approach to the dwellings is wholly inappropriate and 4 dwellings of the same design lack interest and variation and is poor in design terms failing to reflect local surroundings or distinctiveness.

The development would create an incongruous and imposing development to the severe detriment of the rural character of the area being an undesirable intensification of ribbon development that would detract from the rural character of the local environs. The development represents an unplanned advance of urbanisation into the countryside eroding the rural character resulting in a detrimental impact upon the rural landscape and views from and into the proposed extension of Suffolk Coastal and Heaths Area of Outstanding Natural Beauty which lies opposite.

In applying the NPPF's presumption in favour of sustainable development, the development is wholly inappropriate and demonstrably harmful therefore failing to meet the environmental objectives.

- 4 Paragraph 54 of the National Planning Policy Framework 2018 (NPPF) states Local Planning Authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Paragraph 56 of the NPPF states planning obligations must only be sought where they are necessary to make the development acceptable in planning terms, directly relate to the development and fairly and reasonably relate in scale and kind to the development.



Policy COM6 of the adopted Tendring District Local Plan 2007 states "For residential development below 1.5 hectares in size, developers shall contribute financially to meet the open space requirements of the development in proportion to the number and size of dwellings built".

There is currently a deficit of 0.30 hectares of play and formal open space in Wrabness and any further development in Wrabness will increase demand on already stretched facilities.

Due to the lack of play/formal open space in Wrabness it is felt a contribution towards play and formal open space is justified and relevant to the planning application. This application is not accompanied by a correctly completed unilateral undertaking for a contribution towards play and formal open space facilities and therefore this scheme does not comply with Policy COM6.

## **8. Informatives**

### Positive and Proactive Statement

The Local Planning Authority has acted positively and proactively in determining this application by identifying matters of concern with the proposal and discussing those with the Agent. However, the issues are so fundamental to the proposal that it has not been possible to negotiate a satisfactory way forward and due to the harm which has been clearly identified within the reason(s) for the refusal, approval has not been possible.